

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-263-E**

Cherokee County Cogeneration Partners, LLC,)	
)	
Complainant,)	CHEROKEE COUNTY COGENERATION PARTNERS, LLC'S THIRD SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO DUKE ENERGY CAROLINA, LLC AND DUKE ENERGY PROGRESS, LLC
v.)	
)	
Duke Energy Progress, LLC and Duke Energy Carolinas, LLC,)	
)	
Respondents.)	
)	

Cherokee County Cogeneration Partners, LLC (“Cherokee”), pursuant to Rule 103-833(C) of the Rules of Practice and Procedure of the Public Service Commission of South Carolina (“Commission”), hereby serves Duke Energy Carolinas, LLC and Duke Energy Progress, LLC with the following Third Set of Interrogatories and Requests for Production.

INTERROGATORIES/REQUESTS FOR PRODUCTION

1. Please provide an Excel spreadsheet with formulas intact showing the calculation of the Energy \$/kW-year value and Capacity \$/kW-year value for each of the “DEC Oct 2018”, “Dec Sept 2020”, and “DEC Feb 2021” offers in Duke Energy Carolinas, LLC’s and Duke Energy Progress, LLC’s Late-Filed Hearing Exhibit 1.
2. Where the \$/kW-year values are aggregations of specific monthly \$/kW-month payments, please show this aggregation. (Cherokee presumes this applies to the “DEC Sept 2020” and “DEC Feb 2021” offers).

3. Where the \$/kW-year values are aggregations of hourly infra-marginal rents (the difference between Cherokee's \$/MWh costs and DEC's avoided \$/MWh costs), please show this aggregation. (Cherokee presumes this applies to the "DEC Oct 2018" offer).
4. Show any levelizing or averaging (over the years of the term of the PPAs) involved in calculating the \$/kW-year values for capacity and energy for each of the above-referenced offers.
5. Please provide the \$/hour start-cost payment associated with each above-referenced offer, along with the escalation rate.
6. Please confirm whether the \$/kW-year energy values in the table contained in Late-Filed Hearing Exhibit 1 are exclusive or inclusive of start costs.
7. For the "DEC Oct 2018" offer's \$/kW-year energy payment, please show in Excel any adjustments made to infra-marginal rents to account for the \$/hour start cost payment in the "DEC Oct 2018" offer.

ADAMS AND REESE, LLP

s/John J. Pringle, Jr.
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Columbia, South Carolina
August 6, 2021

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DOCKET NO. 2020-263-E**

Cherokee County Cogeneration Partners,)
 LLC,)
)
 Complainant,)
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 v.)
)
 Duke Energy Progress, LLC and Duke)
 Energy Carolinas, LLC,)
)
 Respondents.)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day **Cherokee County Cogeneration Partners, LLC's Third Set of Interrogatories and Requests for Production of Documents to Duke Energy Progress, LLC and Duke Energy Carolinas, LLC** via electronic mail service as follows:

Frank R. Ellerbe III, Esquire Robinson Gray Stepp & Laffitte, LLC fellerbe@robinsongray.com	Heather Shirley Smith Duke Energy Corporation Heather.Smith@duke-energy.com
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s/John J. Pringle, Jr.

August 6, 2021
Columbia, South Carolina